

Remarks

Entry of the above-noted amendments, reconsideration of the application, and allowance of all claims pending are respectfully requested. By this amendment, claims 1, 13, 15 and 20 are amended. These amendments to the claims constitute a bona fide attempt by applicants to advance prosecution of the application and obtain allowance of certain claims, and are in no way meant to acquiesce to the substance of the rejections. It is believed that the amendments herein place the entire application in condition for allowance and/or better form for appeal. These amendments were not made earlier because the claims as previously submitted were believed to be in condition for allowance. Applicants submit no new search is required since all the claim language added to claims 1, 13, and 20 was previously recited in dependent claim 15. Claims 1 and 3-25 are pending.

Claim Rejection - 35 U.S.C. § 102:

Claims 1, 3-7, 11, 13-14, 16, 19-22, and 24 were rejected under 35 U.S.C. § 102(b) as being anticipated by Lantto et al. (U.S. Patent No. 5,537,457; "Lantto"). This rejection is respectfully, but most strenuously, traversed.

Applicants respectfully submit that the Office Action's citations to the applied references, with or without modification or combination, assuming, *arguendo*, that the modification or combination of the Office Action's citations to the applied references is proper, do not teach or suggest the serving mobile switching center that employs the established telephone number to locate the roaming mobile device, as recited in applicants' independent claim 1.

For explanatory purposes, applicants discuss herein one or more differences between the claimed invention and the Office Action's citations to Lantto. This discussion, however, is in no

way meant to acquiesce in any characterization that one or more parts of the Office Action's citations to Lantto correspond to the claimed invention.

Applicants have amended claim 1 to recite "wherein the serving mobile switching center employs the established telephone number to locate the roaming mobile device", which originally appeared in claim 15. Lantto (column 5, lines 38-60) discloses global paging using the unique identity number IMSI. Lantto fails to disclose using an established telephone number to locate the called mobile subscriber MS.

Accordingly, the Office Action's citation to Lantto fails to satisfy at least one of the limitations recited in applicants' independent claim 1.

For all the reasons presented above with reference to claim 1, claims 1, 13, 20 are believed neither anticipated nor obvious over the art of record. The corresponding dependent claims are believed allowable for the same reasons as independent claims 1, 13, 20, as well as for their own additional characterizations.

Withdrawal of the § 102 rejection is therefore respectfully requested.

In view of the above amendments and remarks, allowance of all claims pending is respectfully requested. If a telephone conference would be of assistance in advancing the prosecution of this application, the Examiner is invited to call applicants' attorney.

Respectfully submitted,



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